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\*PRACTICE WITHIN THE DISTRICT OF COLUMBIA  
 IS LIMITED TO MATTERS AND PROCEEDINGS  
 BEFORE FEDERAL COURTS AND AGENCIES

June 21, 2007

VIA TELECOPY 202.219.3923

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 OFFICE OF GENERAL  
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2007 JUN 21 P 5:12

Re: MUR 5906, The Schwan Food Company Inc. Political Action Committee;  
Supplemental Response

Dear Mr. Jordan:

This letter is submitted on behalf of The Schwan Food Company Inc. Political Action Committee (hereinafter "Schwan PAC"), and supplements the response sent April 6, 2007. We wish to take this opportunity to clarify a matter from that letter so as to avoid any misunderstanding of the activities of the Schwan PAC.

The complaint in MUR 5906 alleged that the Schwan PAC had engaged in certain activities, including use of commercial and corporate aircraft, with proper reporting of the value of use of commercial and corporate aircraft. As noted in the April 6, 2007 submission, Respondent respectfully submits none of the allegations of complaint MUR 5906 constitute any violation of law or regulation.

We also wish to note that at no time has the Schwan PAC actually used commercial or corporate aircraft as an in-kind contribution to any candidate for federal office. The reference to "commercial or corporate aircraft" was made merely to directly respond to the text of the complaint. If any candidate for federal office were to use aircraft belonging to Schwan PAC's supporting organization, that candidate would reimburse the supporting organization in accordance with applicable federal law.

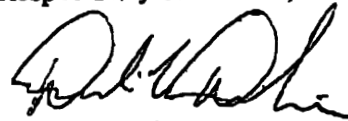
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Letter to Jeff. S. Jordan, Esq.  
June 21, 2007  
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Thank you for the opportunity to clarify the previous submission. As noted in our April 6 submission, we respectfully submit that the General Counsel should find that there is no reason to believe that Respondent has committed any violation or statute or regulation and dismiss the complaint or recommend to the Commission that it dismiss the complaint.

Respectfully submitted,



John W. Bode  
David L. Durkin  
Counsel for Respondent

OFW:mmm

cc: Gordon Crow (via telecopy)

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